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*d/b/a International Marketplace*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

CIRENA TORRES, on behalf of herself and  
all others similarly situated,

Plaintiffs,

vs.

KWONG YET LUNG CO., INC.  
d/b/a International Marketplace, and DOES  
1 through 100, inclusive,

Defendants.

Case No. 2:14-cv-02223-MMD-PAL

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE THE  
DEADLINE TO FILE MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS SETTLEMENT FOR 14 DAYS**

**(SECOND REQUEST)**

1 Pursuant to Local Rule 6-1, Plaintiff Cirena Torres and Defendant Kwong Yet Lung  
2 Co., Inc. d/b/a International Marketplace (hereinafter "International Marketplace"), by and  
3 through their respective undersigned counsel, submit this Stipulation and [Proposed] Order  
4 To Continue The Deadline To File Motion For Preliminary Approval Of Class Settlement  
5 For 14 Days, and Plaintiff and Defendant stipulate, agree, and hereby request as follows:

6 **STIPULATION**

7 1. The current deadline to file a motion for preliminary approval of class  
8 settlement is today, October 1, 2015. This current deadline was set by the Court pursuant  
9 to an earlier stipulation by the parties (Dkt. No. 16), which was approved by the Court  
10 (Dkt. No. 17).

11  
12 2. The parties have prepared and entered into a written and signed class-wide  
13 settlement agreement (including proposed notices to the class, claim form, and proposed  
14 order attached thereto) and a copy of that settlement agreement (including the attachments)  
15 was filed with the Court earlier today (Dkt. No. 21).

16  
17 3. Because the parties have entered into class-wide settlement (and have filed  
18 their written and signed settlement agreement with the Court, Dkt. No. 21), the class-wide  
19 settlement will require the Court's review and approval pursuant to Rule 23(e) of the  
20 Federal Rules of Civil Procedure.

21  
22 4. The parties agree they need a short extension in order to prepare the motion  
23 for preliminary approval. Accordingly, the parties respectfully request and stipulate that  
24 the Court extend the current October 1, 2015 deadline to file a motion for preliminary  
25 approval of class settlement for 14 days, until and including October 15, 2015.  
26  
27  
28

1 Dated: October 1, 2015

Respectfully submitted,

2 By: /s/ Chant Yedalian, Esq  
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24 *Attorneys for Kwong Yet Lung Co., Inc.*  
25 *d/b/a International Marketplace*

26 **ORDER**

27 Having considered the foregoing Stipulation and finding good cause appearing,  
28

1 IT IS HEREBY, ORDERED, ADJUDGED, AND DECREED that the foregoing  
2 Stipulation is GRANTED and the deadline to file a motion for preliminary approval of  
3 class settlement is extended and continued for a period of 14 days, until and including  
4 October 15, 2015.

5  
6 **IT IS SO ORDERED.**

7  
8 Dated: October 1, 2015

A handwritten signature in blue ink, appearing to read 'Miranda M. Du', is written over a horizontal line.

HON. MIRANDA M. DU  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Court using the CM/ECF system which will send notification of such filing to the electronic service list for this case.

Dated: October 1, 2015

CHANT & COMPANY  
A Professional Law Corporation

By: /S/ Chant Yedalian  
Chant Yedalian